

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

**FILED**

JUL 30 2014

**MAGISTRATE JUDGE IAIN D. JOHNSTON**  
**UNITED STATES DISTRICT COURT**

UNITED STATES OF AMERICA

V.

MICHAEL SCHAFFER,  
TEOVONNI CUNNINGHAM,  
also known as "Teo,"  
also known as "T," and  
DARRELL REED

No. 14 CR 50038

Magistrate Judge Iain D. Johnston

(Judge Philip G. Reinhard)

**AGREED PROTECTIVE ORDER**

Upon the oral motion of the United States for entry of an agreed protective order and the defendant having no objection to the motion, it is hereby ordered:

1. All materials produced by the government in preparation for or in conjunction with any stage of the proceedings in this case, including but not limited to grand jury transcripts, agency reports, witness statements, memoranda of interview, financial records, tax records, and any documents provided by the government, excluding trial exhibits, remain the property of the United States. Within 30 days following the later of sentencing, conclusion of an appeal, or an earlier resolution of the charge against the defendant, all such materials and all copies made thereof shall be returned to the United States without further order of Court. All material returned shall be segregated

and preserved by the United States for a period of one year after sentencing or an earlier resolution of the charge against the defendant.

2. All materials provided by the United States may be utilized by the defendant and defense counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than the defendant, defense counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that defense counsel or any other recipient may make relating to the contents of materials provided by the government shall not be disclosed to anyone other than the defendant, defense counsel, and persons employed to assist in the defense, or such other person as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

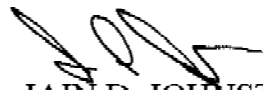
3. The materials shall not be copied or reproduced by defense counsel or any other recipient, except as necessary to provide copies of the materials for use by defense counsel, the defendant and such persons as are employed by them to assist in the defense. Such copies and reproductions shall be treated in the same manner as the original matter.

4. Prior to providing or disclosing any of the materials to any recipient, including the defendant, defense counsel shall provide a copy of this Order to each recipient and shall advise each recipient that at the conclusion of this case, the materials must be returned to defense counsel. All individuals and entities receiving these materials from defense counsel shall be subject to this Order and shall not further disclose

the materials or their contents except as permitted by this Order or any further order of this Court. Defense counsel shall maintain a copy of this Order that has been signed and dated by each recipient who received any materials subject to this Order.

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

ENTER:



IAIN D. JOHNSTON

United States Magistrate Judge

DATED: 7/30/14